

# **EXHIBIT F**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

**FILED**

**11:09 am, Mar 31, 2021**

U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
Roger A.G. Sharpe, Clerk

UNITED STATES OF AMERICA, )  
)  
Plaintiff, )  
)  
v. )  
)  
GEORGE S. BLANKENBAKER, JR., )  
)  
Defendant. )

Cause No. 1:21-cr-102-SEB-TAB

**INFORMATION**

The United States Attorney charges that:

**COUNT 1**  
**Wire Fraud**  
**18 U.S.C. § 1343**

**INTRODUCTION**

At times material to Count 1 of this Information:

1. **GEORGE S. BLANKENBAKER, JR.**, the Defendant herein, was a resident of Marion County or Hamilton County, Indiana, within the Southern District of Indiana, and primarily conducted his business operations from his residences. On certain occasions he conducted business operations from offices located in Marion County or Hamilton County, Indiana outside of his residences.

2. As a self-described conductor of investments and international trade, **GEORGE S. BLANKENBAKER, JR.** created certain business entities between May 2008 and August 2016 and later used these entities, which he then owned and managed, in the execution of the scheme and artifice to defraud further described herein. The entities so utilized were Stargrower

Commercial Bridge Loan Fund 1 LLC and Stargrower Asset Management, LLC (hereinafter the Stargrower Entities).

3. **GEORGE S. BLANKENBAKER, JR.** induced various individuals to invest in the Stargrower Entities listed above. **GEORGE S. BLANKENBAKER, JR.** represented to the investors that the funds they invested would be used to finance the use of shipping containers of food in the “international trade of fast moving consumer products similar to what you would find in a grocery store.”

4. The investment funds received by **GEORGE S. BLANKENBAKER, JR.** were deposited into Stargrower Entities bank accounts which he solely controlled and as to which he was the sole signatory.

## THE SCHEME TO DEFRAUD

5. Beginning not later than the 30th day of September 2016, and continuing until at least the 16<sup>th</sup> date of May 2019, **GEORGE S. BLANKENBAKER, JR.** did knowingly, and with the intent to defraud, devise and execute a scheme and artifice to defraud, and to obtain money by means of materially false and fraudulent pretenses, representations and promises, knowing that the pretenses, representations, and promises were false and fraudulent when made. The false and fraudulent pretenses, representations and promises included, but were not limited to:

- a. Soliciting millions of dollars of investment funds under false pretenses, including false representations regarding how the investment funds would be used. Specifically, **GEORGE S. BLANKENBAKER, JR.** falsely advised investors that their investment funds would be invested in a manner that would result in routine interest payments back to the Stargrower Entities from the businesses into which

the funds were invested and that then the Stargrower Entities would make regular periodic interest payments to the investors.

- b. Falsely advising investors regarding the nature of the businesses into which their funds would be invested.

6. After certain investors' funds were deposited into the Stargrower Entities bank accounts, **GEORGE S. BLANKENBAKER, JR.** did not invest the funds as represented, but rather used the funds:

- a. To make interest payments and return of principal payments to other Stargrower Entities investors; and
- b. In other business ventures of **GEORGE S. BLANKENBAKER, JR.**, contrary to representations he made to the Stargrower Entities investors; and
- c. For personal expenses.

#### **EXECUTION OF THE SCHEME**

7. On various occasions beginning not later than the 30th day of September 2016, and continuing until at least the 16<sup>th</sup> day of May 2019, in Hamilton County and Marion County, in the Southern District of Indiana and elsewhere,

#### **GEORGE S. BLANKENBAKER, JR.,**

Defendant herein, having devised a scheme and artifice to defraud and for obtaining money by means of false or fraudulent pretenses, representations, or promises, as described in Paragraphs 1 through 6 above as to Count 1, did, for the purpose of executing such scheme and artifice, knowingly cause various wire communications of writings or signals to be transmitted in interstate commerce from Indiana to another state, in violation of Title 18, United States Code, Section 1343.

**COUNT 2**  
**Wire Fraud**  
**18 U.S.C. § 1343**

## INTRODUCTION

At times material to Counts 2 and 3 of this Information:

1. **GEORGE S. BLANKENBAKER, JR.**, the Defendant herein, was a resident of Marion County or Hamilton County, Indiana, within the Southern District of Indiana, and primarily conducted his business operations from his residences. On certain occasions he conducted business operations from offices located in Marion County or Hamilton County, Indiana outside of his residences.

2. In March 2013, **GEORGE S. BLANKENBAKER, JR.**, in concert with other persons, caused to be created a business entity in the name of EDU Holding Trust (the Trust). That entity was designed to receive funds from investors for the purchase of life insurance policies on a secondary market at an amount less than the maturity amount of the policies.

3. Investors in the Trust received a document entitled “life settlement purchase agreement” created by **GEORGE S. BLANKENBAKER, JR.**, in which they were assured that they were beneficiaries of the Trust and would receive compensation from the profits generated when the life insurance policies matured, that is, when the insureds died.

4. In another document created by **GEORGE S. BLANKENBAKER, JR.**, and provided to investors, he notified investors that an independent bank, the Bank of Utah, would serve as an escrow agent to receive funds upon the maturity of the life insurances policies and then distribute the funds to the investors appropriately.



## THE SCHEME TO DEFRAUD

5. Beginning not later than the 6<sup>th</sup> day of October 2016, and continuing until at least the 10<sup>th</sup> date of November 2016, **GEORGE S. BLANKENBAKER, JR.** did knowingly, and with the intent to defraud, devise and execute a scheme and artifice to defraud, and to obtain money by means of materially false and fraudulent pretenses, representations and promises, knowing that the pretenses, representations, and promises were false and fraudulent when made. Specifically, **GEORGE S. BLANKENBAKER, JR.** falsely advised investors in the Trust that they would receive compensation from the profits generated when the life insurance policies matured, when, in fact, he knew they would not as he diverted some of these funds to himself for other purposes.

## EXECUTION OF THE SCHEME

6. On various occasions beginning not later than the 7<sup>th</sup> day of November 2016, and continuing until at least the 10<sup>th</sup> day of November 2016, in Hamilton County and Marion County, in the Southern District of Indiana and elsewhere,

**GEORGE S. BLANKENBAKER, JR.,**

Defendant herein, having devised a scheme and artifice to defraud and for obtaining money by means of false or fraudulent pretenses, representations, or promises, as described in Paragraphs 1 through 5 above as to Count 2, did, for the purpose of executing such scheme and artifice, knowingly cause various wire communications of writings or signals to be transmitted in interstate commerce from Indiana to another state, in violation of Title 18, United States Code, Section 1343.

**COUNT 3**  
**Money Laundering**  
**18 U.S.C. § 1957**

On or about the 8<sup>th</sup> day of November 2016, in Marion County, in the Southern District of Indiana,

**GEORGE S. BLANKENBAKER, JR.,**

Defendant herein, did knowingly engage in a monetary transaction in criminally derived property in the amount of \$28,299.92, more or less, derived from specified unlawful activity, for the payment of a credit card debt, in that the said **GEORGE S. BLANKENBAKER, JR.** did cause to be transferred or exchanged, in and affecting interstate commerce, funds drawn on a checking account maintained at Financial Center First Credit Union, a financial institution, said funds having been derived from the wire fraud perpetrated by **GEORGE S. BLANKENBAKER, JR.** as charged in Count 2 of this Information, in violation of Title 18, United States Code, Section 1957.

**FORFEITURE ALLEGATION**

1. The allegations contained in Counts 1 and 2 of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Section 1343 set forth in Counts 1 and 2 of this Information, the Defendant, **GEORGE S. BLANKENBAKER, JR.** shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses. Upon conviction, the Defendant agrees to an order or forfeiture in the form of a

money judgment of \$1,550,025.48, representing the amount of proceeds the Defendant obtained from his wire fraud offenses.

3. If any of the property described above, as a result of any act or omission of the Defendant:

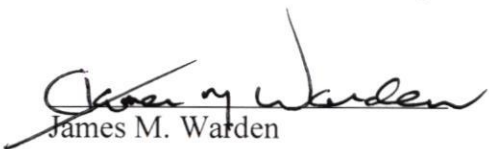
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

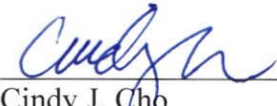
All pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

JOHN E. CHILDRESS  
Acting United States Attorney

By

  
James M. Warden  
Assistant United States Attorney

By

  
Cindy J. Cho  
Criminal Chief